

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

SUPER 8 MOTELS, INC.)	
)	
Plaintiff,)	
)	
v.)	Case No. 3:06-cv-00206-MHT
)	
JALA INVESTMENTS, INC., et al.)	
)	
Defendant.)	

**SUPER 8 MOTELS, INC.'S SUBMISSION STATEMENT IN SUPPORT
OF ITS MOTION FOR SUMMARY JUDGMENT**

Plaintiff Super 8 Motels, Inc. ("SMI") submits the following evidence in support of its motion for summary judgment:

EXHIBIT 1 - Affidavit of Valeria Capers Workman and exhibits thereto:

1. **Exhibit A:** Franchise Agreement between SMI and Himat, Inc. and Guaranty
2. **Exhibit B:** Special Warranty Deed in favor of JALA Investments, Inc.
3. **Exhibit C:** Handwritten note from Defendant Himat, Inc. regarding foreclosure
4. **Exhibit D:** Cease and Desist Letters
5. **Exhibit E:** Itemized Statement of Outstanding Recurring Fees
6. **Exhibit F:** Notice of Termination of Franchise Agreement
7. **Exhibit G:** Post Termination Obligations Checklist
8. **Exhibit H:** Consolidated Discovery Requests to Defendant JALA Investments, Inc.

Respectfully submitted this 6th day of November, 2006.

s/Robin G. Laurie

One of the Attorneys for Plaintiff
Super 8 Motels, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing and/or that a copy of the foregoing has been served upon the following by United States Post Office depository on the 6th day of November, 2006.

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